

Exhibit 1

1
2
3
4
5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA
7

8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
10 LITIGATION

Case No. 23-md-03084-CRB

11 This Document Relates to:
12 ALL CASES
13

**DECLARATION OF TIFFANY R. ELLIS
IN SUPPORT OF PLAINTIFFS' LIST OF
DISPUTED ENTRIES FOR SPECIAL
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Car Kane Conway & Wise, an attorney licensed in
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries from
6 Defendants' June 19, 2025 Privilege Log that was submitted for Master Review on June 21,
7 2025. Defendants' June 19, 2025 privilege log contained 94 entries regarding documents related
8 to Uber's Board of Directors meetings.

9 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for
10 Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs
11 incorporate the brief to support the specific reasons each entry on Plaintiffs' List of Disputed
12 Entries from Defendants' June 19, 2025, Privilege Log was challenged. The Brief included the
13 general background of the privilege dispute process to date, the legal standard for Plaintiffs
14 raising challenges to Defendants' privilege log entries, and a general argument for the challenges
15 Plaintiffs raised.

16 **Uber's Board of Directors Meeting Minutes and Materials**

17 4. During the August 30, 2024, Status Conference the production of Board of
18 Directors materials was raised with the Court. *See* ECF 1622.

19 5. On May 15, 2025, Plaintiffs learned that Uber would be producing Board of
20 Directors Meeting minutes that were not previously produced.

21 6. On May 16, 2025, Defendants produced the first part of the Board of Directors
22 Meeting materials with overbroad redactions including extensive commercially sensitive
23 redactions. While Plaintiffs believed Uber's redactions of such materials were improper and
24 unnecessary in light of the robust Protective Order, the Parties discussed the redactions and
25 agreed the documents would be produced with lesser redactions.

26 7. On May 19, 2025, a hearing before Judge Cisneros was held to discuss continuing
27 the depositions regarding Uber's CEO Dara Khosrowshahi and Uber's former CEO Travis
28 Kalanick in light of the dispute surrounding the produced Board of Directors Meeting minutes

1 and materials.

2 8. On May 27, 2025, Defendants provided a privilege log that contained four entries
3 related to Board of Directors meeting minutes and materials.

4 9. The Parties conferred on June 5, 2025, about the Board of Directors Meeting
5 minutes.

6 10. On June 6, 2025, Defendants provided a privilege log that contained 15 entries
7 related to Board of Directors meeting minutes and materials.

8 11. On June 6, 2025, Defendants provided a chart that identified the date and Bates
9 information of the meeting minutes and materials that Uber had already produced and documents
10 that had been withheld or redacted.

11 12. On June 9, 2025, Defendants provided a privilege log containing 31 entries related
12 to Board of Directors Meeting minutes and materials.

13 13. On June 9, 2025, Plaintiffs, believing redactions to the Board of Directors
14 Meeting minutes were overboard and improper but in the spirit of cooperation sent Defendants
15 their position on a compromise regarding the production of Board of Directors materials and
16 dispute resolution on privilege.

17 14. On June 10, 2025, as part of the ongoing negotiations on the Board of Directors
18 dispute resolution, Plaintiffs provided Defendants a list of Board of Directors meeting minutes
19 selected pursuant to the Parties agreed upon compromise.

20 15. On June 11, 2025, the Plaintiffs had a meet and confer with Yasi Sedghani,
21 Uber's Legal Director, and the Parties continued to discuss a path forward to resolve the Board
22 of Directors meeting materials without court intervention.

23 16. On June 12, 2025, the Parties continued to discuss potential resolution to the
24 Board of Directors Meeting material production without court intervention and came to an
25 agreement regarding Defendants' Board materials productions. The Parties agreed to jointly
26 submit privilege disputes to Master Jones for expedited in-camera review.

27 17. On June 16, 2025, Plaintiffs provided Defendants with two lists, the first being
28

1 Plaintiffs' challenges to Defendants' June 9, 2025, privilege log. The second contained the
2 disputed entries related to Board of Directors Meeting minutes and materials logged on
3 Defendants; May 27, 2025, June 6, 2025, and June 9, 2025, privilege logs.

4 18. Plaintiffs notified Master Jones on June 16, 2025, that the Parties reached an
5 agreement regarding Defendants' produced Board of Directors-related minutes and materials. As
6 part of that agreement, the parties agreed to jointly submit privilege-related disputes for
7 expedited in-camera review by the Master. Plaintiffs provided the Master with a list of 25
8 disputed Board of Directors-related minutes and materials privilege entries. Master Jones granted
9 the Parties' request for expedited in-camera review.

10 19. On June 17, 2025, Defendants informed Plaintiffs that the 25 entries identified on
11 the list submitted to Master Jones would be re-produced on June 19, 2025.

12 20. On June 18, 2025, the Parties conferred regarding a process to resolve disputes
13 regarding Uber's Board of Directors Meeting minutes and materials. The Parties agreed a call
14 with Master Jones and her team would be needed to discuss logistics and timing issues related to
15 the expedited review.

16 21. On June 19, 2025, the Parties had a conference with Master Jones concerning the
17 expedited review of the board materials.

18 22. Defendants provided an additional production of Board of Directors Meeting
19 minutes and materials and provided a supplemental privilege log containing 94 entries related to
20 Board of Directors meetings.

21 23. On June 21, 2025, Plaintiffs provided a list to Master Jones and Defendants,
22 noting challenges to 58 entries from Defendants' June 19, 2025, privilege log.

23 Executed this 24th day of June 2025 in Detroit, Michigan.

24
25 /s/ Tiffany R. Ellis
26 Tiffany R. Ellis